

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No: 18-cr-10391-RGS
)	
DEREK SHEEHAN,)	
Defendant.)	

JOINT STATUS REPORT

Pursuant to Local Rule 116.5(a), the parties hereby file the following status report prepared in connection with the status conference scheduled for December 17, 2018.

(1) Automatic Discovery/Pending Discovery Requests

The Government has provided automatic discovery as well as documents, materials, and information whose production is not required by federal or local rule. The defendant is reviewing the discovery materials and has requested certain additional items. Beyond those requests, he does not yet know whether he will make additional discovery requests.

(2) Additional Discovery

The Government has agreed to provide certain additional items, and may decline to produce others. The parties are also in the process of arranging an opportunity for counsel to view the forensic evidence in the custody of the FBI.

(3) Timing of Additional Discovery Requests

The parties are in the process of conferring about the pending discovery requests, and will be positioned to seek the Court's intervention (if necessary) before the interim status conference.

(4) Protective Orders

No additional protective orders are anticipated by the parties.

(5) Pretrial Motions

It is premature to decide whether the Defendant will file any pretrial motions under Fed. R. Crim. P. 12(b).

(6) Expert Discovery

The Government agrees to provide any expert witness disclosures 21 days prior to trial. The Defendant agrees to provide any expert witness disclosures 14 days prior to trial.

(7) Speedy Trial Act

All of the time has been excluded from the defendant's indictment through the date of the initial status conference scheduled for December 17, 2018. The parties request that the time be excluded until the interim status conference, pursuant to the provisions of 18 U.S.C. § 3161(h)(7)(A).

(8) Next Status Conference

Given all of the foregoing information, the parties request that the initial status conference, scheduled for December 17, 2018, be canceled. The parties request an interim status conference in approximately 30 days.

Respectfully submitted,

DEREK SHEEHAN
Defendant

ANDREW E. LELLING
United States Attorney

By: /s/ William Keefe
William Keefe
Attorney for Derek Sheehan

By: /s/ Anne Paruti
Anne Paruti
Assistant U.S. Attorney

Dated: December 17, 2018

CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of the foregoing upon all counsel of record by electronic filing notice.

/s/ Anne Paruti
Assistant U.S. Attorney

Dated: December 17, 2018